

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

POWER INTEGRATIONS, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 04-1371-JJF
	)	
FAIRCHILD SEMICONDUCTOR	)	
INTERNATIONAL, INC., and FAIRCHILD	)	
SEMICONDUCTOR CORPORATION,	)	
	)	
Defendants.	)	

**NOTICE OF PRIOR ART PURSUANT TO 35 U.S.C. SECTION 282**

PLEASE TAKE NOTICE, pursuant to 35 U.S.C. Section 282, that the following will be relied upon to support Fairchild Semiconductor International, Inc and Fairchild Semiconductor Corporation ( Fairchild ) that United States Patents Nos. 4,811,075 ('075 patent); 6,107,851 ('851 patent); 6,229,366, ('366 patent); and 6,249, 876 ('876 patent) are invalid because they were invented by another, anticipated, and obvious.

**A. Patents**

1. United States Patent Number 5,631,920, Spread Spectrum Clock Generator, K. Hardin, Issued May 20, 1997 (produced as Bates Nos. FCS0527468-78) was published as of May 20, 1997.
2. United States Patent Number 4,507,796, Electronic Apparatus Having Low Radio Frequency Interference From System Clock Signal, D. Stumfall, Issued March 26, 1985 (produced as Bates Nos. FCS1688159-65) was published as of March 26, 1985.
3. United States Patent Number 4,638,417, Power Density Spectrum Controller, H. Martin, G. Hitler & D. Parsley, Issued January 20, 1987 (produced as Bates Nos. FCS0525445-8) was published as of January 20, 1987.
4. United States Patent Number 5,498,995, Short Circuit Frequency Shift Circuit for Switching Regulators, T. Szepesi & H. Santo, Issued March 12, 1996 (produced as Bates Nos. FCS0524804-20) was published as of March 12, 1996.
5. United States Patent Number 5,555,168, Frequency Modulated Switching Power Supply, B. Ferrario, Issued September 10, 1996 (produced as Bates Nos. FCS0524821-6) was published as of September 10, 1996.

6. United States Patent Number 4,626,879, Lateral Double Diffused MOS Transistor Devices Suitable for Source-Follower Applications, S. Colak, Issued December 2, 1986 (produced as Bates Nos. FCS0000526-32; FCS0526662-8) was published as of December 2, 1986.
7. United States Patent Number 6,005,444, Circuits For Producing Control Currents For a Current Controlled Oscillator, Carpelan, Issued December. 21, 1999) (produced as Bates Nos. FCS1691477-98) was published as of December. 21, 1999.
8. United States Patent Number 5,604,465, Adaptive Self-Calibration For Fast Tuning Phaselock Loops, Farabaugh, Issued February 18, 1997 (produced as Bates Nos. FCS1691499-509) was published as of February 18, 1997.
9. United States Patent Number 4,283,236, Method of Fabricating Lateral PNP Transistors Utilizing Selective Diffusion And Counter Doping, R. Sirsi, Issued August 11, 1981 (produced as trial exhibit DX193) was published as of August 11, 1981.
10. United States Patent Number 4,823,173 J. Beasom, Issued April 18, 1989 (produced as Bates Nos. FCS0525249-56) was published as of April 18, 1989.
11. Application for U.S. Patent No. 4,823,173 filed January 7, 1986 (produced as Bates Nos. FCS1688778-FCS1688899)
12. United States Patent Number 5,264,719, J. Beasom, Issued November 23, 1993 (produced as Bates Nos. FCS0525257-FCS0525272) was published as of November 23, 1993.
13. Application for U.S. Patent No. 5,264,719 filed May 24, 1991, priority to January 7, 1986. (produced as Bates Nos. FCS1688900-FCS1689178)
14. United States Patent Number 4,394,674, H. Sakuma, T. Suzuki, filed October 9, 1980, priority to Oct. 9, 1979 (produced as Bates Nos. FCS1693654-FCS1693667)
15. United States Patent Number 4,422,089, H. M. J. Vaes, J.A. Appels, A. W. Ludikhuizen, filed December 22, 1980, priority to September 8, 1980 (produced as Bates Nos. FCS1693668-FCS1693681)
16. United States Patent Number 4,270,137, D. Coe, filed December 15, 1978, priority to December 15, 1977 (produced as Bates Nos. FCS1693682-FCS1693691)
17. United States Patent Number 4,300,150, S. Colak, filed June 16, 1980 (produced as Bates Nos. FCS1693692-FCS1693696)
18. United States Patent Number 4,344,080, J. Tihanyi, filed December 3, 1979, priority to December 5, 1978 (produced as Bates Nos. FCS1693697-FCS1693704)

19. United States Patent Number 4,409,606, K. Wagenaar, H. C. De Graaff, J. A. Appels, filed January 8, 1981, priority to March 10, 1980 (produced as Bates Nos. FCS1693705-FCS1693712)

20. United States Patent Number 4,485,392, B. Singer, filed December 28, 1981 (produced as Bates Nos. FCS1693713-FCS1693718)

**B. Publications (reference is to all pages unless otherwise indicated)**

21. A. C. Wang & S. R. Sanders, Programmed Pulsewidth Modulated Waveforms for Electromagnetic Interference Mitigation in DC –DC Converters, IEEE Transactions on Power Electronics, Vol. 8, No. 4, pp. 596 – 605 (Oct. 1993) (produced as Bates Nos. FCS0000516-25; FCS0524402-11; FCS0525273-82; FCS0527640-FCS0527643) was published as of October, 1993.
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23. B. Andreyckak, The UC3823A, B and UC3825A, B Enhanced Generation of PWM Controllers, Unitrode Application Note U –128 (1994) (produced as Bates Nos. FCS0524551-59) was published as of 1994 .
24. Toko, Power Conversion IC Data Book TK75001, pp. 3-1 – 3-12 (1996) (produced as Bates Nos. FCS0002173-85; FCS0524981-92; FCS0525246-48 (figures only); FCS0002145-53) was published as of 1996.
25. National Semiconductor, Power ICs Databook, LM2577, 2587, pp. 3-60 – 3-139 (1995) (produced as Bates Nos. FCS0524993-5038) was published as of 1995.
26. National Semiconductor, LM2671, pp. 1-22 (Aug. 1997) (produced as Bates Nos. FCS0002451-76; FCS0525161-86; FCS0527249-70) was published as of August, 1997.
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31. Motorola, High Performance Resonant Mode Controller, MC34067, MC33067 (produced as Bates Nos. FCS0525631-FCS0525639, FCS0527094-FCS0527096, FCS1686749-FCS1686751) was published as of 1996.
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34. Maxim, 5V/3.3V/3V 5A Step –Down, PWM, Switch –Mode DC –DC Regulators, MAX796 –MAX799 (Nov. 1, 1994) (produced as Bates No. FCS0525749) was published as of November 1, 1994.
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36. F. Goodenough, Off –Line PWM Switching Regulator IC Handles 3W, Electronic Design (Mar. 22, 1990) (produced as Bates Nos. FCS0525776-9; FCS0528084-9) was published as of March 22, 1990.
37. R. Frank, et. al., LM3001/LM3101 A 1 MHz Off –Line PWM Controller Chipset with Pulse Communication for Voltage –Current – or Charge – Mode Control, AN –918, National Semiconductor (Jan. 1994) (produced as Bates Nos. FCS0525786-93; FCS0527208-15) was published as of January, 1994.
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51. Unitrode Integrated Circuits, UNITRODE u –128, Application note, the UC3823A,B and UC3825A,B Enhanced Generation of PWM Controllers, pp. 10-228 – 10-236 (1994) (produced as Bates Nos. FCS0527322-30; FCS1686710-8) was published as of 1994.
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54. P. Horowitz & I. Robinson, Laboratory Manual for The Art of Electronics, pp. 17-1 – 17-3 (Aug. 6, 1981) (produced as Bates Nos. FCS0527486-90; FCS1686642-6) was published as of August 6, 1981.

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56. SGS –Thompson, TEA2262, Switch Mode Power Supply Controller, pp. 1 – 9 (Apr. 1996) (produced as Bates Nos. FCS1686647-55) was published as of April, 1996.
57. C. Hoekstra, Frequency Modulation of System Clocks for EMI Reduction, Hewlett –Packard Journal Article 13, pp. 1 – 7 (Aug. 1997) (produced as Bates Nos. FCS1686656-62) was published as of August, 1997.
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61. Unitrode Integrated Circuits, UCC1807-1/-2/-3, UCC2807-1/-2/-3, UCC3807-1/-2/-3 Low Power BiCMOS Current Mode PWM (Jan. 1995) (produced as Bates Nos. FCS0527436-9; FCS0527457-8; FCS1686699-702) was published as of January, 1995.
62. National Semiconductor, Data Acquisition Databook (1995) (produced as Bates Nos. FCS0527453-5) was published as of 1995.
63. Unitrode Integrated Circuits, UC1828, 2828, 3828, 1840, 2840, 3840, 1841, 2841, 3841, 1848, 2848, 3848, 1851, 2851, 3851, 1854, 2854, 3854, 1874-1, -2, 2874-1, -2, 3874-1, -2, Unitrode Current Mode PWM Controller IC (Nov. 1994) (produced as Bates Nos. FCS0527459-67) was published as of November, 1994.
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**C. Prior Inventions, Devices, Public Use/On Sale**

119. 400V transistor from NEC (KE001450)
120. 1000V transistor from Tektronix (KE001450)
121. 400V transistor from Philips (KE001450)
122. 200-400V devices for display driving from Sharp (KE001451)
123. 200-400V devices for display driving from Supertex (KE001451)

- 124.200-400V devices for display driving from Siliconix (KE001451)
- 125.200-400V devices for display driving from Telmos (KE001451)
- 126.30-50V display drivers from AMI (KE001451)
- 127.30-50V display drivers from Holt (KE001451)
- 128.Smartpower II D-MOS vertical transistor from Motorola (KE001451)
- 129.Smartpower I device from Motorola (KE001451)
- 130.Proposal from Xerox (KE001451-KE001452)
- 131.200V device from Thompson CSF (KE001452)
- 132.BIDFET technology from Texas Instruments (KE001452)
- 133.Bipolar high voltage transistors combined with low voltage CMOS from Motorola, Analog Devices, Sprague and Unitrode (KE001452)
- 134.Proposal from Philips (KE001453)
- 135.Proposal from Motorola (KE001453)
- 136.400V switch for subscriber line interface from Bell (KE001453)
- 137.200V Supertex high voltage C-MOS approach for display drivers “open drain” (KE001520, KE001481)
- 138.90V Supertex high voltage C-MOS approach for display drivers “push and pull” (KE001520)
- 139.Integrated DMOS device from SGS (KE001482)
- 140.Lateral DMOS device from General Electric (KE001483)
- 141.250V DMOS in combination with 80 volt bipolar and low voltage CMOS from Texas Instruments (KE001570)
- 142.250V DMOS in combination with 80V bipolar from Thompson (KE001570)
- 143.200V DMOS in combination with low voltage CMOS from Supertex (KE001570)
- 144.100V DMOS in combination with low voltage CMOS from Siliconix (KE001570)

**D. 35 U.S.C. §§ 102(e)/(g) Prior Art (reference is to all pages unless otherwise indicated)**

- 145. Engineering Notebook of James Douglas Beasom (produced as Beasom Deposition Exhibit 8 (DX130) and documents produced as Bates Nos. I000230-I000234, I000415-I000420) dated August 8, 1979 through June 1985.
- 146. Notes of James Douglas Beasom (documents produced as Bates Nos. I-000235-I000260) dated February through March 1984.
- 147. Beasom Test Chips (shown in I-000412, 414) dated August 15, 1985.
- 148. Notes And Test Data Re Beasom Test Chips (produced as Beasom Deposition Exhibit 9) dated July 18, 1985 through January 13, 1986.
- 149. Notes, Run Cards And Test Data Re Beasom Test Chips (produced as Beasom Deposition Exhibit 10) dated July-August 1985.
- 150. Notes, Run Cards and Test Data Re Beasom Test Chips (documents produced as Bates Nos. I000421-I000451, I000452-I000464) dated June-August 1985.
- 151. Beasom Test Wafers (shown in I-000412-13) created around August 15, 1985.
- 152. Plot of Beasom Test Wafer (document produced as Bates Nos. I000411) showing test wafer, created around August 15, 1985.
- 153. Color Magnified Photographs of Beasom Test Wafers (documents produced as Bates Nos. I000465-67) showing test wafer, created around August 15, 1985.

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